

COMMONWEALTH OF PENNSYLVANIA COUNTY OF WAYNE

DAVID H. FAUX,)	
	Plaintiff)	Docket No. 514-cv-2023
	vs.)	
NEW HOPE FERTILITY BROOKLYN, PLLC	CLINIC)	
	Defendant)	

PLAINTIFF'S INTERROGATORIES DIRECTED TO DEFENDANT

Plaintiff requests defendant to answer under oath the following Interrogatories within thirty days of service in accordance with Pa.R.C.P. 4005 and 4006 (i.e., November 6, 2023). These Interrogatories are deemed to be continuing to the extent provided in Pa.R.C.P. 4007.4:

- 1. Regarding the embryos of patient Kato (DOB 7/11/1973) and plaintiff, frozen, upon information and belief, on 7/14/2013 and 7/15/2013 (the "Embryos"), what is the exact age/fertilization date of each of the Embryos?
- 2. What is the health of the Embryos, particularly with regard to the possibility of successful surrogacy?
- 3. Please give a full description of the meaning of the grading codes "EXBL 423" and "BL 333."
- 4. For each answer to the above interrogatories, please provide the name, address and position of the person who supplied the information.

Plaintiff (Pro Se)
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